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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Experimental "Ride-Along"
Classification Change for Periodicals

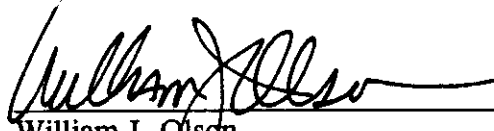
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Docket No. MC2000-1

COX TARGET MEDIA, INC.
AND COX CONSUMER SAMPLING
THIRD INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS ALTAF H. TAUFIQUE (CC/USPS-T1-21-22)
(November 10, 1999)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Cox Target Media, Inc. and Cox Consumer Sampling, proceeding jointly herein as the "Cox Companies," hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

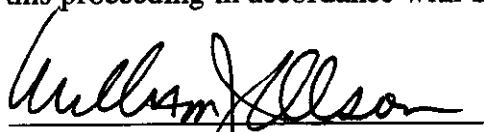
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Cox Target Media, Inc.
and Cox Consumer Sampling

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

November 10, 1999

CC/USPS-T1-21.

Library Reference LR-CC-1 contains six exhibits. Each exhibit is an enveloped piece with the characteristics listed below. All envelopes have the same dimension, approximately 6 inches high by 9 inches long. Each envelope has a window, and an addressed piece showing through the window as it would if it were mailed at Standard (A) rates, but for purposes of your response to parts a-c of this interrogatory, please assume that the envelopes would meet whatever regulations the Postal Service might prescribe.

Exhibit	Product Samples	Computer Disks	Flat Coupon Inserts	Approx. Weight (ounces)
A	0	0	7	1
B	0	0	16	2
C	0	0	25	3
D	1	0	25	3
E	2	0	25	3
F	1	1	16	3

- a. Under the Ride-Along experiment proposed in this docket, please specify for each of the above exhibits whether it could be enclosed within a polybagged magazine as a Ride-Along insert or onsert. Should you need to qualify your answer in one or more respects, please do so; *e.g.*, the exhibits could be an onsert to magazines within certain trim sizes, but not otherwise.

- b. For each exhibit which could not qualify as an insert or onsert under the proposed regulations, please specify all reasons why the exhibit does not qualify.
- c. For each exhibit which could not qualify as an insert or onsert under the proposed regulations, please specify what changes would be necessary in order to enable the exhibit to qualify as an onsert.
- d. With respect to the envelopes, what changes, if any, would be required in order for the exhibits to qualify as inserts or onserts under the Ride-Along experiment proposed in this docket?

CC/USPS-T1-22

Assume that the host piece without the Ride-Along insert or onsert is a magazine whose thickness exceeds 3/4 inches; *i.e.*, this dimension exceeds the maximum thickness for a flat, and the host piece is therefore classified as a parcel for delivery purposes.

- a. Under the conditions described above, what are the physical requirements and restrictions for the Ride-Along insert or onsert?
- b. Assuming that each of the following product samples weighs no more than 3.3 ounces, please indicate whether each one would or would not qualify as a Ride-Along inserts or onsert in a polybagged host magazine that is classified as a parcel for delivery purposes. In the event you cannot answer affirmatively or negatively based on the information provided here, please specify what additional information you would need in order to make a determination.

- (i) A tube of toothpaste.
- (ii) A tube of facial cream or hand cream.
- (iii) A plastic bottle of shampoo.
- (iv) A roll of toilet tissue.
- (v) A plastic container of hair spray.
- (vi) A plastic container of mouthwash.
- (vii) A bar of soap.
- (viii) A can of potato chips.